

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH DAKOTA
WESTERN DIVISION**

MILBANK)	
INSURANCE COMPANY,)	
)	
Plaintiff,)	Case No.: 17-CV-5066-KES
v.)	
)	
RUSHMORE PHOTO & GIFTS, INC., a South)	
Dakota Corporation, JRE, INC., a South Dakota)	
Corporation, CAROL NIEMANN, PAUL A.)	
NIEMANN, and BRIAN M. NIEMANN,)	
)	
Defendants.)	
)	

STIPULATION OF DISMISSAL WITH PREJUDICE

Plaintiff/Counter-Defendant Milbank Insurance Company and Defendants/Counter-Plaintiffs Rushmore Photo & Gifts, Inc., JRE, Inc., Carol Niemann, Paul A. Niemann, and Brian M. Niemann, pursuant to Rule 41(a)(1)(A)(ii), stipulate to the dismissal of the present action with prejudice, with each party to bear its own costs, expenses, and attorneys' fees.

Respectfully Submitted,

Dated: March 12, 2024

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